

IN THE DISTRICT COURT OF MUSKOGEE COUNTY  
STATE OF OKLAHOMA

SARAH LEE, EDWYNA SYNAR, AND  
KYLE BROWN, INDIVIDUALLY AND  
ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

PLAINTIFFS,

V.

TTCU FEDERAL CREDIT UNION,  
D/B/A TULSA TEACHERS FEDERAL  
CREDIT UNION,

DEFENDANT.

CASE NO. CJ-2020-283

Hon. Judge Smith

**JOINT MOTION TO EXTEND DEADLINE FOR SETTLEMENT  
ADMINISTRATOR TO SERVE NOTICE ON CLASS MEMBERS**

Plaintiffs Sarah Lee, Edwyna Synar, and Kyle Brown (collectively, “Plaintiffs”) and Defendant TTCU Federal Credit Union, d/b/a Tulsa Teachers Federal Credit Union (“Defendant”) (Plaintiffs and Defendant collectively are the “Parties”), by their respective counsel, respectfully request that this Court extend the deadline herein for the Settlement Administrator<sup>1</sup> to serve Notice on the Class Members. In support of their Joint Motion, the Parties state as follows:

1. The Parties reached an agreement to settle the litigation herein on a class-wide basis.

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<sup>1</sup> All capitalized terms not defined herein shall have the same meaning as set forth in the *Settlement Agreement and Release* between the Parties which was attached to the *Unopposed Motion for Preliminary Approval of Class Action Settlement* filed herein on May 14, 2025.

2. On or about March 25, 2025, the Parties entered into the *Settlement Agreement and Release* (the “Settlement Agreement”).

3. Among other things, the Settlement Agreement identified the proposed timeline to effectuate the settlement including, but not limited to, the deadline for the Settlement Administrator to mail notice of the settlement to Class Members.

4. On May 14, 2025, the Plaintiffs filed their *Unopposed Motion for Preliminary Approval of Class Action Settlement* (“Motion for Preliminary Approval”) and attached the Settlement Agreement for the Court’s consideration.

5. On June 11, 2025, the Court granted the Motion for Preliminary Approval and entered the *Preliminary Approval Order* (“Preliminary Order”).

6. The Preliminary Order and the terms of the Settlement Agreement set administrative deadlines including the deadline for Notice of the settlement to be mailed to Class Members.

7. On July 11, 2025, the Parties requested additional time up to and including October 8, 2025, to mail the Notices to Class Members because the process to gather class data was taking longer than anticipated.

8. The same day, on July 11, 2025, the Court granted the Parties’ extension for the Settlement Administrator to serve notices on Class Members and reset the Final Approval Hearing to November 6, 2025, at 9:30 a.m.

9. Following the Parties’ attempts to resolve remaining questions about the class data provided by Defendant, on September 8, 2025, the Parties requested

additional time up to and including December 8, 2025, to mail the Notices to Class Members.

10. On September 16, 2025, the Court granted the Parties' extension for the Settlement Administrator to serve notices on Class Members and reset the Final Approval Hearing to February 19, 2026, at 9:30 a.m. The time to send Notices to Class Members had not yet expired.

11. Since the entry of the July 11, 2025 and September 16, 2025 Orders, the Parties have been working together to gather class data in the most cost effective and efficient way so that the requisite Notices can be sent to Class Members.

12. Unfortunately, there still exists extensive data to review which requires additional time to ensure accuracy and consistency for the Class Administrator to send Notices to Class Members.

13. Accordingly, the Parties hereby request an enlargement of an additional sixty (60) days to and including February 6, 2026, to mail the Notices to Class Members.

14. Granting the extension of sixty (60) days to and including February 6, 2026, to mail the Notices to Class Members will delay the Final Approval Hearing currently scheduled on February 19, 2026, at 9:30 a.m.

15. The Parties respectfully request that the Final Approval Hearing be reset to a date that corresponds with the schedule laid out in the Preliminary Order and the terms of the Settlement Agreement while allowing the requested additional time for the Settlement Administrator to send Notices to Class Members.

16. This Motion is not intended for purposes of undue delay or prejudice and all Parties, through counsel, advise they continue to work collaboratively and diligently to address the outstanding issues.

WHEREFORE, Plaintiffs and Defendant respectfully request that this Court extend the deadline for the Settlement Administrator to send Notice to Class Members by sixty (60) days to and including February 6, 2026, reset the Final Approval Hearing, and for all others just and proper relief.

Dated: October 20, 2025

Respectfully submitted and agreed to by,



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